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By ECF January 2, 2024

The Honorable Richard M. Gergel United States District Court for the District of South Carolina P.O. Box 835 Charleston, South Carolina 29402

Re: Tyco Fire Products LP v. AIU Ins. Co., et al., No. 2:23-cv-02384 (D.S.C.)

Dear Judge Gergel:

We write on behalf of Plaintiff Tyco Fire Products LP ("Tyco") in connection with Tyco's Motion to Compel Production of Documents by AIG, filed today (ECF 202).

In light of the expedited discovery schedule in this matter, pursuant to which fact discovery will be completed by March 1 (ECF 111), and the fact that depositions, which partly depend on the documents that are the subject of Tyco's motion, must begin imminently, Tyco respectfully requests that the Court order the following expedited briefing schedule on Tyco's Motion to Compel:

- January 9: AIG's response
- **January 12**: Tyco's reply (if any)

Tyco appreciates the Court's continued attention to this matter.

Respectfully,

/s/ Allan B. Moore

Allan B. Moore

Cc: All Counsel of Record (by ECF)